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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

NABIL KHLAFA,

Plaintiff,

v.

**OREGON HEALTH AND SCIENCE
UNIVERSITY, DANNY JACOBS,
DARRYL WALKER, CATHRYN
DAMMEL, ILONA COX, SALLYDAY
EISELE,**

Defendants.

Case No. 3:23-cv-01013-SI

**DECLARATION OF KAREN O’KASEY
IN SUPPORT OF RULE 11 SANCTIONS**

I, Karen O’Kasey, do hereby declare as follows:

1. I am the one of the attorneys representing defendant OHSU in the above-entitled action. I make this declaration in support of the defendant’s reply to plaintiff’s response to this court’s order to show cause.

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2. Pursuant to this court's request for an estimate of fees and costs incurred in responding to plaintiff's motion to file a second amended complaint, defendant incurred fees in the amount of \$3,007.00 and costs in the amount of \$2.25 in responding to plaintiff's motion to file a second amended complaint.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATED this 18th day of December, 2024.

/s/ Karen O'Kasey

Karen O'Kasey

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of December, 2024, I served the foregoing

DECLARATION OF KAREN O’KASEY IN SUPPORT OF RULE 11 SANCTIONS on the following party at the following address:

Nabil Khlaifa
5331 S Macadam Ave
Suite 258-107
Portland, OR 97239
Nabilnoble77@gmail.com
Pro Se Plaintiff

by e-mailing and by mailing a true and correct copy thereof, certified by me as such, placed in sealed envelopes addressed as set forth above, and deposited in the U.S. Post Office at Portland, Oregon on said day with postage prepaid.

/s/ Karen O’Kasey

Karen O’Kasey